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IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICKY JAMES JR. SALAS SANTOS,

Defendant.

CRIMINAL CASE NO. 20-00021

**UNITED STATES' VOIR DIRE
[PROPOSED]**

Pursuant to the order of this Court (ECF 47) and Federal Rule of Criminal Procedure 24(a), the United States submits the following proposed voir dire questions.

A. WITNESSES (Assuming that the Court reads the names of the attorneys and the trial witnesses to the panel.)

1. Are any of you friendly or associated or related with the attorneys for the United States, or for the defense, in this case, either socially or through your role as jurors in other cases? If so, please explain the nature of the prior knowledge and how it may affect your attitude as a juror in this case.

2. Do any of you know any of the witnesses who will testify? If so, please describe your acquaintance.

3. Do any of you know the defendant or his family members socially or through some

1 business or other acquaintanceship? If so, please describe the association.

2 B. GENERAL INFORMATION

3 4. The government requests that the court ask each juror to give a verbal summary of the
4 following information:

5 5. Please explain for us the nature and extent of your educational background, including
6 any special training courses and vocational seminars you have attended. If you attended college,
7 what was your major field of study?

8 6. Are you married? Do you: live alone? Share a house with another person or persons?
9 Live with family?

10 7. Please describe the nature of your employment and that of your spouse or partner, and
11 if you are married.

12 8. Please describe your immediate family and, how each formally employed member is
13 employed, the nature of any past employment, and the educational background of your
14 immediate family.

15 9. Please explain your past experience on juries in both civil and criminal cases. Tell us
16 when the case was tried and the nature of the case.

17 10. Is there anything about the nature of this case, that involves allegations involving a)
18 the attempted possession of methamphetamine hydrochloride with intent to distribute and b)
19 possession with intent to distribute methamphetamine hydrochloride, that makes you wish not to
20 be involved in the trial of this case? If so, what is it?

21 11. Do you have any personal objection to the laws of the United States that make the
22 offense of attempted receipt of methamphetamine illegal? Possessing methamphetamine with
23 intent to distribute? Laws that make receiving, selling and distributing methamphetamine
24 illegal? That even permit the forfeiture of money and homes to the federal government?

1 12. Have you or any of your acquaintances ever had any experiences with the United
2 States Postal Inspection Service, Drug Enforcement Administration, the Guam Police
3 Department, or any other law enforcement entity that would influence your ability to sit as a fair
4 and impartial juror in this matter?

5 13. Is there anything that you have read in newspapers, magazines, the internet, or
6 viewed on television regarding drug or narcotic issues that would influence your ability to sit as a
7 fair and impartial juror in this case? Regarding methamphetamine or “ice?”

8 14. Do you have any fixed views about the United States Department of Justice, United
9 States Postal Inspection Service, the Drug Enforcement Administration, or the Guam Police
10 Department that would affect your ability to be an impartial juror in this case?

11 C. OTHER MATTERS

12 15. Has anyone talked to you about this case or attempted to influence you in any way
13 about it since you were notified you were on the jury panel? Who? When? Where? Who else
14 was present? What did you say? Before you were so notified, did anyone attempt to influence
15 you about jury service on this matter? Please tell us the details.

16 16. Have you, your relatives or close friends ever been charged with or investigated for a
17 crime? If so, what was the nature of this investigation or charge? How was it handled?

18 D. GENERAL QUALIFICATION

19 17. Would you judge this case solely on the evidence before you, and not allow anything
20 else to affect your verdict?

21 18. Would you be able to decide this case if your decision had to be based only on how
22 believable you found the witnesses to be?

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24 //

19. Do you know any reason whatsoever why you may not sit as a fair and impartial juror to both sides in this case?

RESPECTFULLY SUBMITTED this 14th day of April, 2021.

SHAWN N. ANDERSON
United States Attorney
Districts of Guam and NMI

By: /s/ Rosetta L. San Nicolas
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